

U.S. DISTRICT COURT - N.D. OF N.Y.
FILED
MAY 20 2004
AT 10 O'CLOCK
Lawrence K. Baerman, Clerk - Syracuse

David E. Sipfle
Plaintiff(s)
vs. Cortland Country Club
with Brenda Chaffee, William Higgins,
Paul Butchess, Gerald Coggi
Defendant(s)
(Cortland Country Club and Brenda Chaffee)

Civil Case No.:
5:04cv565
CIVIL
RIGHTS
COMPLAINT
PURSUANT TO
42 U.S.C. § 1983

NAM/6HL

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: David E. Sipfle
Address: P.O. Box 54, 718 Division St. Apt #4
De Ruyter NY 13052

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Cortland Country Club and Brenda Chaffee
Official Position: (Post) Office manager
Address: 5365 Route 41
Homer NY 13077

Official Position: (Past?) President of FCCC, Board of governors
Address: P.O. Box 227, West Rd (Route 281)
Cortland NY 13045

c. Defendant: Cortland Country Club, Paul Gutchess
WEST RD (RTE 281)
Official Position: P.O. Box 227 (Past) Greens Committee Chairman
Address: Cortland NY 13045

Continue (d) next page
additional →

Additional Defendants may be added on a separate sheet of paper.
Listed on separate paper (over)

4.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary.)

1. I am a male who was sexually harassed and who opposed a discriminatory practice.
2. I worked as a golf course superintendent
3. I was subjected to a sexually hostile environment by office manager, Brenda Chaffee, of a tieperate dept. From mine. She being aware that I am a married man and that my wife had worked for respondent. Conduct included but not limited to her calling me into her office, giving gifts, sending me away from my job duties to do personal favors ^{on demand} including her home and back to do (repairs) touching my shoulders, rubbing against me, being flirtatious in particular in front of my wife dates ^{10-13, 2001} causing marital strife. Also blocking doorways. Intrusion into FORM E(1)(a).2 my bedroom curtains

Defendant: Cortland Country Club
and Gerald Coggi
Official Position: Club Manager
Address: P.O. Box 227, West Rd. (Rt 281)
Cortland NY 13045

Facts2

With her breasts forward/back arched towards me (accidently? - on purpose?) buings, press brushing, rubbing motion (were they in the way?) Happened many times with my wife catching ^{glimpses} Chaffee was unaware of my wife's presence. This was very revolting, reminds me of a "sloppy cow." I turn my back/moreaway. Chaffee got onto my truckster (a work vehicle used by groen crew) and sat next to me uninvited. She insisted on doing this in front of my daughter, Diannah Sipple (7-2000). Chaffee had no purpose for excuse used. She had bad habit of getting to close to me for comfort, despite my protest. She was touching me constantly invading my space. Chaffee made displays of ^{indecent} exposure to myself and former employee, Clint Skinner (various dates include 6-19-96) Skinner told my wife and I (date: 6-2002) when he was an employee his observation was: she had her legs spread apart, showing all of her open crotch area, a lot of private flesh showing, while she sat on the Clubhouse steps. He said "it was there if you wanted it" and "she had peculiar behavior". To my wife, he said "he noticed I, (David Sipple) would avoid her when she approached me. I would avoid her like a cat that slinks away from something it does not like." (date: 6-2002) During her time to instruct me usng the computer (date: July 1994) In my office, she was too close, kept touching me, this is when she tried to kiss me, forcing me to move back standup and move away period. Carol White (deceased bartender) encouraged gift giving when I didn't want to participate. White and Chaffee persisted, haraged me with calls "come up and bring gifts". I tried to avoid, but had to ^{get} pay Xmas bonus checks which are kept in her office. I felt pressured, very uncomfortable, was against Club policy. Ruining my Xmas Spirit before I see my family. Gifts were left on G. Cuggi's desk. Chaffee called me, left messages for me that ended up not being about work, more to socialize or ask personal favors, not pertaining to work. Numerous times these calls were made on her phone to my work phone.

Facts

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(work phone, answer machine) and notes left on my desk - Sometimes in person with Chaffee's handwriting ^{signed "Bren"} or taken by my assistant, John Walker. At times messages to call her, which ended up that when I responded, were not about work. (she would not say what she wanted) until I called back or went up to her office. (Then I would find out it was not work.) I was always on guard, never knowing if it might be an important work problem or her wanting something personal. Her pressure became increasingly pushy, degrading, making my job difficult, if she were not pleased first (with her improper work behavior) I could not eat or get coffee without her approaching and touching me: It was making me very sick, lost my appetite, quit eating lunch in clubhouse - had been one of my privileges - lunches included with job. A further incident, Chaffee had a rush UPS(parts) delivery in her office: my UPS(parts) delivery's were to be dropped at CCC's proshop. I had gone to the proshop to get my package. I spent valuable time waiting, making calls, running around for next day air delivery ^{package} ~~UPS delivery~~. I finally found it in her office after much expiration of time and aggravation. I said "what the hell is this doing here?" (as my seeder was down and there was 3 days of rain coming in the forecast, I'm getting the course ready for the next tournament) I took my package and left, I presume she took it. From Pro Shop ^(conduct) had confrontation (date Oct. 13, 2001) with her and another on date: May ^{2/15} ~~conduct~~ as she continued to annoy me as if the confrontation never happened, she never intended to comply, would not give up. She wanted it to start all over again in a wrong way. I.e.: Chaffee continued to close her office door, looking for sympathy, acting guilty - not sorry, hiding what she ^{did} done, knowing she had been caught, not ashamed. I refuse to protect her. What she has done is unacceptable. I only wanted to do my job, make an honest living supporting my own family and my own home. Chaffee had a phony work attitude, working with her was a farce, full of merrass.

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Facts

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Concerning William Higgins, president of Cortland Country Club, board of governors (during this same time) I spoke several times with Higgins about trouble with Chaffee (date: August, 2001) In club's maintenance shop (location of the building where my office is and where Greeks Committee Meetings are held) I complained to Higgins about Chaffee. His response was "she wouldn't be here much longer. She would be out of here" (date Sept 16²⁰⁰¹) After Collins Cup Tournament (I received letter of praise from Collins Cup Committee, includes letter to President of Club, Steve Gulini) I also have copies (dated Sept 15+16 2001) Higgins with another member, Mike Caltan, my wife Gina and myself are sitting in Club house. Higgins said "we have to start treating some of our people better", "but not the one upstairs", note: Cuggi, club manager and Chaffee office manager, office's are upstairs. I was led to believe changes were going to be made for the better especially when he said "when I am president of the Club, there are going to be changes made" Mike Caltan saying "first we must put it to the board" Higgins was looking directly at us, most of the time smiling. (I am hopeful for a change as I continued working for the Club for Insurance for my family and I needed relief from Chaffee.) (date: Sept 15+16 2001)

Note! (March 25, 2002) after I spoke with Higgins about Chaffee, I'm told Chaffee written up before: leaking information after board meetings. Higgins saying there would be Zero tolerance for harassment of any kind (date: March 25, 2002)

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Facts

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(date Dec. 2001) My wife, Gina sends Christmas Card disapproving of Chaffee. Higgins came down to my office (maintenance shop) to talk to me about card said he found card disturbing and that my wife should not disturb Brenda (Chaffee) any more (date April, 2002): letter date April 19, 2002 (we have copy with registered return receipt.) my wife sent to Higgins a complaint about Chaffee. Response is from Club's attorney, Robert M. Shaffer, denies problem and that nothing will be done - no action advised. (have copy) I stopped Higgins at Club driveway ~~at Club driveway~~ to complain about Chaffee (May ^{date:} 2002) He said, very harshly, he "didn't want to talk about it" send complaint to Coggi ^{date:} (5-25-2002) which I did (also I have registered return receipt with copy of complaint) After this complaint mailed (June ^{date:} 5, 2002) Higgins said to me that "I could be fired for anything re: driving a golfcart to fast!" date June 7, 2002) ~~for meeting: A meeting~~ is scheduled by Coggi and Higgins ~~then~~ cancelled by Higgins. Meantime I have had appointment with my attorney, Plavoulkos ^{about sexual harassment} ~~employment~~ problem (date: June 11, 2002). I meet with Coggi and Higgins, with my son Joshua Sipfle, also a grounds crew employee at C. Club, to be my witness, as Attorney Anita Roberts advised my wife, Gina to tell ~~me~~ to do during telephone conversation between my wife and Attorney A. Roberts (date Junell, 2002) Advice to myself Dave, from Attorney Plavoulkos almost the same, say nothing and write it down (Josh Sipfle took notes) 10:00 A.M. June 12, 2002.

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Facts 6

(date: June 19 2002) meeting took place with my attorney, Plavoukos, Club's attorney Robert M. Shafer, Coggi, Higgins and myself. It was agreed that I wouldn't have to go up to the Clubhouse anymore (as Plavoukos revealed to Shafer about Chaffee pushing her bustline against me) - under circumstances I had my ~~assistant~~ get mail. - Plavoukos also asked for my job description from CCC. This job description, I have copy of, arrived to my home after 10 days. It was different from my description submitted to CCC April 1 2001 - I also have that copy. The new one especially states: "Maintain a professional working relationship with all Club departments, but especially the Pro Shop and Business Office" (date: 6-21-02) please note: Brenda Chaffee, the offender is the Office manager. (June 17, 2002) Higgins has asked John Walker, my ~~assistant~~ "if he is ready to step up to Superintendent" - in my son Joshua Sipfle's presence. (date June 30, 2002) - I went to visit Clint Skinner at his home. I ask him for a statement regarding Chaffee's conduct. Skinner said "yes". My wife, Gina sends him a self addressed stamped envelope to mail to myself, David Sipfle. (date: July 6, 2002) I have a note showing my notes of message by Coggi to me: Coggi 1:38 pm. Saturday (I have finished my duties, gone home for weekend before this message is made) I receive message 7:35 A.M. Monday: "Meeting 11:30 Monday" (I made written note: Higgins in Clubhouse was on course 3 1/2 hrs. round golf, done around 11:00 A.M. while Higgins in Clubhouse told Coggi meeting in Clubhouse ~~noon~~)

Facts

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11:30 monday call Dave : as per Coggi message.

I do own an answer machine at my home and the C.C.Club does have my home phone number. Coggi would never mention any problems to me in person. I believe Coggi was ~~told~~ and pressured to write to me various notes and letters, sign his name, with Higgins ordering Coggi to do so.

(date July 8, 2002) - I'm suspended while performing my duties : Meeting is scheduled that no-one will tell what it is about. Not Coggi nor Gutchess when I ask them. Higgins does say "PERSONAL!" I have no time to contact attorney. I did say "if this is a greens and grounds issue, come down to my shop and I will gladly meet. I was told to come up to the Club house, where I believed Chaffee would be. I declined to attend in Club house meeting. Gutchess, greens committee chairman, said to me "is this how you're going to handle it?" I said "yes". He went into the Club house. Later, while I was working on the course, Higgins and Gutchess came out to me on a golfcart, handed me an envelope containing my letter of suspension. (I went directly to my home. Time 11:30 A.M. July 8, 2002) The suspension letter said "with pay until further notice" I didn't understand what happens after "further notice".

Fact

(date: July 10, 2002) I am making phone calls to Human Rights. Senator Nancy Lorraine Hoffman and all legal advice including my attorney even to Clint Skinner. None of my calls do any good. That night I have nightmares/terrors. (I could get no calls answered ~~at~~ during day) I continue to make and wait for phone calls.

(date: July 12, 2002) I'm filling out the forms received from Human Rights 9:30 AM at my kitchen table at home. My wife, Gina reminds me to call CCC at about 9:45 AM. When I do call I speak with Coggi. I told him I could not get in touch with my attorney, so I cannot make the meeting. Gatchess came on the phone. He ask "where am I?" I said "home". He demanded I be at the Club in 30 minutes. (They did not give me an extra 2 hours as stated in their (respondent letter to Human Rights August 22, 2002) or be fired and hung up the phone. I could not travel to CCC in 30 minutes, as I would have to pass through 7 towns, a 27 mile trip. I believe this was a threat to my personal safety. My wife heard the phone conversation, she was also next to me in the kitchen.

Continued next page →

(I receive a notice from Coggi that)
(I am terminated as of July 12, 2002 by mail)
(also dated the same. This also dated same)
(as when I called about meeting scheduled July 12, 2002)

Continue next page →

Facts

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Concerning Paul Gatchess, past: ?Greens Committee Chairman of Cortland Country Club. After a greens committee meeting I spoke with Gatchess (date: Oct. 2001) especially about the trouble with Brenda Chaffee. He seemed to listen very carefully - his response was I wouldn't have to deal with her, only himself, Gatchess (note: this is how I understood my description of my job to be: To deal with one - the Greens Chairman.)

Facts

Concerning Gerald Coggi, club manager. He complained to me (after pulling up along side of me in parking lot of club, with one of his usual comments "here comes that miserable c - - +") I would turn and leave, let Coggi take care of it. Chaffee had come out of the Clubhouse, rushed his car, before he could come out of it. (date 8-2000)

Facts

All mentioned parties were aware of my wife (Gina Sipfle) ~~had~~ medical problem that she and I both are dealing with. Brenda Chaffee's conduct was very stressful to deal with for both my wife and I, compounded by Cortland Country Club's president William Higgins, Paul Gatchess and Gerald Coggi. Especially Chaffee from the start.

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Facts 10

My Unemployment claim July 22, 2002, I received 2 checks only July 29 and August 6, 2002. A total of \$10.00. Then I receive notice from Labor Dept. that there is an issue regarding unemployment Insurance. "Your benefits will be withheld pending an investigation, from you regarding your separation from Cortland Country Club". Letter dated 10-10-02 (I have the notice) I missed making my mortgage payment as a result.

Fact me and my wife

(date: July 26, 2002) a letter from attorney (also a member of FCCC) Donald Yager, sends letter saying any further contact made to Clint Skinner will be considered harassment, not to make any further attempts in any manner.

— Through my years of employment with CCC, I had complained to other Club presidents and greens chairman to no avail. I was told only "to get along" I believed that when William Higgins and Paul Gatchess attained their positions I would finally be heard, appreciated and an improvement made to help with my work problem with Chaffee. I have letters of praise that had assured me of my job up until my complaint about Chaffee's harrassment. Chaffee is a user and abuser of people. Working with her was disgusting, embarrassing, revolting with a puke-jerking feeling. I don't know what was her corrupt personal problem, I know it wasn't mine to care. She was a "pain in the ass" that no decent person should have to tolerate. There were enough problems to running a golf course. My dedication to my career was not ever meant for her advantage. I only wanted to totally, exclusively support my adoring wife, children, home, well being to whom I am personally responsible for with satisfaction of job well done. Despite her warped thinking and immoral influence by some clubmembers and employees, I refused to go along with it. I did my work and gave my best to CCC as much as humanly possible.

Facts

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I am Christian and hold with the doctrine of Jesus Christ, My former employer, coworkers and members of Cortland Country Club contradicted attempted to contraind my religious beliefs. I felt the very hounds of hell were nipping at my heels, Forementioned tried to bring me down to their level to force me to abandon my religion. I have been Christian all of my life.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Sexual Harrassment: examples on
Fact sheets David Sipfle: victim
offender: Brenda Chaffee

SECOND CAUSE OF ACTION

Retaliation: threatened employment, then coerced
terminated, cutoff unemployment with no warning
after having received for two weeks (unemployment checks)
David Sipfle: victim
offenders: William Higgins
Paul Gutchess, Gerald Coggi

THIRD CAUSE OF ACTION

Defamation: causing verbal abuse and
threats by family, and former friends to discriminate
against me. Losing my home and peace of mind
with various property lost. My wife was assaulted
and harassed by several members of my family as result
and my wife was injured

6. Plaintiff(s) demand(s) a trial by

Jury -or- Court

(Circle only one).

4th Cause
concerning:
Disability

- (A) Failure to employ.
- (B) Termination of employment.
- (C) Denial of participation in public service or program.
- (D) Failure to make alterations to accommodate disability.
- (E) Retaliation.
- (F) Other acts as specified below:

Disparate Treatment

Disparate Impact

6.

FACTS

On the following page, set forth the facts of your case which substantiate your claim of discrimination. List the events in the order they happened, naming defendants involved, dates and places.

Note: Each fact should be stated in a separate paragraph; paragraphs should be numbered sequentially.

You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint.

You may use additional sheets as necessary.

Truckster Back Fired in my ear at close range
est. June 1986 in Maintenance Shop in close proximity
to grounds person Richard Post. I was on the floor
behind machine to view a problem area. I asked the
worker to turn on the machine, then it back fired, I have
had noticeable hearing problems ever since that episode
Performing my job I could well. Understanding conversation
was difficult.

Facts2

I did not appreciate especially Brenda Chaffee touching me on my back, shoulders, arms when I was unaware of her presence. It would startle ~~me~~ me unnecessarily very much, breaking my concentration and I found her action repulsive, I never liked her touch or approach. Her voice was high pitched except when her voice was low, I would especially notice her degrading speech. Most of the time what she had to say was nonsense and very little work related. She was like noise pollution. (1985-2002) Although I asked for different work arrangements apart from Chaffee it was denied. I was never fully able to communicate the problems that existed or given the chance to explain. My wife attempted to bring out facts so this situation could be investigated more closely. She was denied by Higgins with Club attorneys (have copies of letters date: ¹⁹4, 2002, 5-1, 2002) I needed someone I could trust to witness and present my problem. That is why I had my son, Joshua at a meeting and hired Lee Plavoukos dates: (6-11-2002) and (June 19, 2002) Lee Plavoukos was made aware that I had hearing impairment. (also during a physical with Dr. Creamer, he also discovered my hearing impairment and concealed me about it date Oct, 2001) that physical was also for my wife and I to talk over having more children to prepare for pregnancy - so much stress was happening that my wife and I stopped plans for more children) My superiors never spoke to me calmly. Their tone of voice became more harsh in intensity closing in to the time of my termination. Caused me to become fearful, upset, very nervous about my job and children added to my family, which I did talk with Coggi about with my wife present. date: (Oct 12, 2001: date) (about more children) including Chaffee's presence with another office person. Am

Facts

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Chaffee seemed very disturbed about the subject of my wife and I anticipating more children (babies) (10-12, 2001).

I have documented dates of conversations with William Higgins and Paul Gutchess of August 2001; Sept 16 2001; Oct 2001, Dec. 2001; March 25 2002; April 2002; ^{Gutchess} May 2002; June 7, 2002; June 12, 2002; June 30, 2002; July 6 2002; July 8, 2002; Gerald Coggi, Club manager acting as spokesman at times (July 6, 2002) the note I have is "Dave, please remove your wife's voice from the answer machine - Coggi" - 6-29-02. This upset me as I find my wife's voice soothing to me. This request was very disturbing.

Human Rights intake was difficult for me to hear and understand especially the date of 7-02, 07-18 2002 and Dec 3003 was very very hard to hear.

William Higgins statement to Executive Dept. Division of Human Rights is miscontrued with twisting of facts. Please note he does mention on page 2, paragraph 5 it says "Dave had been spoken to numerous times about these requirements" I naturally would need to hear things said repeatedly because of my hearing. I always managed to meet the requirements in timely manner, never late.

Higgins statement date Aug 22-02 ^{so far now} is verified. That many times I opposed some requirements that involved Chaffee even by Higgins statement: he also does not make clear the problems were brought forward with Higgins trying to stop it and deny the problems, although I do try to communicate with him. I have documentation of letters and my wife's diary, witnesses, ect and medical records showing undue stress placed on myself and wife for the stress - Great Stress. Myself and my wife are tenacious when he states (paragraph 2, page 2, Aug 22-02) "There are a number of issues she would not let go of" was actually held by myself and my wife not just my wife.

Facts4

Higgins would not consider, accomadate, be helpful to me at anytime. His general attitude to be nonapproachable, I will give examples as follows: I have letters of praise from past presidents and committees. These stopped when Higgins was coming into the position of president of CCC. He could only find fault with me, on ~~two~~ occasions he did praise (He was chairman of Member Guest Committee and had won that tournament ~~Estimate 1998~~ ^{May 2000 and Breeze}). While on CCC Board of Governors, Higgins (1990 to present) constantly in disagreement at meetings, especially greens/grounds meetings, he intentionally changed voted in decisions after meetings saying to me don't listen to them ie: (Bob Demery, Steve Wall, Jen Barden, Bernie Wineberg, John Wanish) Deliberately misrepresenting information to Board of Governors even when he was not a part of the Board or a committee. When Higgins is appointed President of Club - when no one else wanted the position - he was asked, then appointed - all 12 board members had been asked, prior to Higgins, all but Higgins declined. Higgins then appoints Paul Gutchess for Greens Committee chairman. He (Gutchess) was warned by several members at CCC and myself of Higgins tendency to "roll over" people (Oct 2001) I felt the full affects of his pressure and total disregard for understanding. He chose only to see it his way. The welfare of his own satisfaction and the Club as stated in Club's Flyer The Breeze, July 2002, "presidents message" is very interesting & I have the Flyer, "The Breeze" Drinking alcohol was encouraged especially after meetings (^I ^{do not stay long} ^{I must travel 29 mls.}) home) Tony Sarceno (golf pro) during visit to Club w/ wife encouraged open tab "to drink in excess (we did not) Higgins has shown signs of resentment to my wife, he sneers at ^{at her} my wife chose to stay close to me, especially because of my hearing impairment.

dr5

Facts5

(August 2000) Coggi, club manager, called me "Buddy," (did this many times) which in turn a bartender Ricky Cheesebough calls me "Buddy" with my wife present. Cheesebough's wife, Tonya, a waitress approached my wife and I with off "color comments" about "playing a game" seems she was trying to start something like fooling around, I was astounded and surprised by her saying these things, with her actions, that my wife ended up hearing very well, what I missed hearing, my wife did hear (this is all happening during a Member Guest, Aug 2000) In Coggi's office my wife and I are speaking with him, Tonya Cheesebough comes in and interrupts talking abusively and vulgarly about CCC members and the member-guest tournament, she with Coggi going along with her, sickened me, my wife is appalled as she can hear much better than me, we are embarrassed as the member-guest is one of the highlights, biggest and most important tournaments of the season, that I have worked very hard for, I made complaint to Coggi about Cheesebough's within a week's time, that ^{Attorney, member of CCC} I wanted it documented (Aug 2000), It was not. My wife spoke to Russ Ruthig Dec. 2001 about incidents happening at CCC, he say's "oh that's just Tonya" and to document the incidents (make reports) Tonya Cheesebough is very rudely staring at us at the 2001 member-guest during most of dinner and our plates are not removed for each entree all eating utensils were left in front of us, (Oct 11, 2001) again she is very rude, staring at us, removed our drinks, wasn't her job where we sat. She had been warned to stay away from us by Coggi through my request. On (March 25, 2002) I finally made sure the Cheesebough's and Brenda Chaffee are documented on record by Gerald Coggi, Note: Ricky Cheesebough was encouraging his wife's misbehavior. They both acted in place of Coggi: They would take over whether Coggi is there or not. (March 2002) Coggi is promoted to General Manager which oversees entire Club's operations, including my job.

Facts6

concerning Paul Gotchess: past greens committee chairman of Cortland Country Club (CCC). After a greens committee meeting I spoke with Gotchess (date Oct. 2001) especially about the trouble with Brenda Chaffee. He seemed to listen very carefully his response was I wouldn't have to deal with her only himself, Gotchess. (Note: this is how I understood my description of my job to be - to deal with one the greens chairman. This is a demonstration of how a conversation can be held - yet Gotchess was "rolled over" by Higgins. My asking for help goes ignored again.

Facts 7

I am Christian and hold with the doctrine of Jesus Christ. My former employer, coworkers and members of Portland Country Club contricted attempted to contrained my religious beliefs. I felt the very hounds of hell were nipping at my heels. Forementioned tried to bring me down to their level to force me to abandon my religion. I have been Christian all of my life.

Cortland Country Club (CCC) members would yell at me
making the sound of voices distorted (to this day making
me to still have nightmares about people yelling at me and
I don't know what they are saying.) — Answer machine was
very difficult to hear and understand (I had to replay several
times) During Meetings I always asked for them to repeat
themselves and they became irritated with me is this is why I
date: 14/2002 avoided meetings without someone there that I could trust and
help me - especially just before I was fired — This also makes conversation
with coworkers difficult and why I am of few words.

7. **PRAYER FOR RELIEF**

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Wages lost	\$ 90,095.00
Unemployment benefits	1,600.00
Former (Family home) Home	85,000.00
Land (real property, family)	8,600.00
Household and personal property	15,000.00
Legal fees and other misc debts	2,200.00
	\$ 193,895.00 total

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 05/20/04

Danielle Sipple

Signature of Plaintiff(s)
 (all Plaintiffs must sign)

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Wages lost \$90,095.00

unemployment benefits \$1,600.00

former home \$85,000⁰⁰ (family home)

Land (real property) \$8,600.00

House hold property

Includes other personal property \$15,000⁰⁰

Legal fees and other misc debts \$2,200⁰⁰

\$ 193,895.00

I declare under penalty of perjury that the foregoing is true and correct.

DATED:

5/20/04

David L. Syffe

Signature of Plaintiff(s)
(all Plaintiffs must sign)